REMARKS

Claims 1-19 are presented for consideration, with Claim 1 being independent.

The specification and abstract have been reviewed and amended to correct minor informalities and improve their idiomatic English form.

Independent Claim 1 has been amended to further distinguish Applicant's invention from the cited art. In addition, editorial changes have been made to selected claims.

Initially, Claims 12 and 13 were rejected under 35 U.S.C. §112, second paragraph, as allegedly being indefinite. Particular attention was paid to the grounds for this rejection as set forth on page 2 of the Office Action in amending Claims 12 and 13 as shown above. Accordingly, it is submitted that all of the claims are in compliance with the particularity and distinctness requirements of the statute. Therefore, reconsideration and withdrawal of the rejection of the claims under 35 U.S.C. §112, second paragraph, is respectfully requested.

Claims 1, 2, 6, 8-11, 14, 15, 17 and 19 stand rejected under 35 U.S.C. §102(b) as allegedly being anticipated by <u>Funatsukuri</u> (JP '325). Claims 1-3, 5, 10, 11, 17 and 19 are rejected as allegedly being anticipated by <u>Hatano</u> '243. In addition, Claims 16, 18 and 19 stand rejected under 35 U.S.C. §103 as allegedly being obvious over <u>Funatsukuri</u> in view of <u>Bohler</u> '445, Claim 4 is rejected as allegedly being obvious over <u>Hatano</u> in view of <u>Bornhorst</u> '474, and Claim 7 is rejected as allegedly being obvious over <u>Hatano</u> in view of <u>Pettitt</u> '073. These rejections are respectfully traversed.

Applicant's invention as set forth in Claim 1 relates to an image display apparatus comprising an image display element for modulating incident light and displaying an image, and an illumination device for sequentially irradiating with light in each color the image display element, which is adapted to change an image displayed on the image display element in

synchronization with the irradiation of the light to thereby recognize the image. The illumination device comprises a light source for emitting white light, a plurality of color filter members being rotatably arranged between the light source and the image display element, and a filter drive means for rotationally driving each of the plurality of color filter members individually. The illumination device further sequentially converts the white light emitted from the light source into each color of light rotationally driving the color filter members and switches image quality of a displayed image by switching the rotationally driven color filter members. As amended, Claim 1 sets forth that the plurality of color filter members comprise a first filter member and a second filter member, and an area of a certain color area on the first filter member is different from that on the second filter member. Support for the claim amendments can be found, for example, in Figures 2 and 5 and in the accompanying specification.

In accordance with Applicant's claimed invention, a versatile and high quality image display device is provided.

Funatsukuri is directed to a projection color image display device that provides three sheets of color wheels 21, 22 and 23 with a reflection area reflecting a red, green or blue color beam and transmitting the remaining colors, and motors 71, 72 and 73 for rotating the color wheels. The rotation of the wheels is controlled so that the same color reflection areas of respective color wheels are not superimposed on each other. In addition, a microlens array 31 converges reflected light beams from the color wheels on corresponding pixels of a liquid crystal display element 32. In contrast to Applicant's claimed invention, however, Funatsukuri is not understood to teach or suggest, inter alia, color filter members having an area of a certain color area on a first filter member being different from that on the second filter member.

Therefore, reconsideration and withdrawal of the rejection of Claims 1, 2, 6, 8-11, 14, 15, 17 and 19 under 35 U.S.C. §102(b) is respectfully requested.

Hatano relates to a liquid crystal display apparatus that includes, with reference to Figure 6, a display medium 10, a projection light source 16, a polarization beam splitter 17, a projection lens 18 and a screen 19. A rotating color filter 62 is disposed on a reading side of the apparatus, between the light source and the beam splitter, and consists of red, green and blue filters. A rotating color filter 61 is disposed on a writing side of the display, between liquid crystal light valve 13 and a light attenuator 64. As understood, color display is realized by synchronously driving the rotational color filters 61 and 62. In contrast to Applicant's claimed invention, however, Hatano does not teach or suggest, among other features, rotationally driving the color filter members and switching image quality of a display image by switching the rotationally driven color filter members and having color filter members having an area of a certain color area on a first member being different from that on a second member.

Therefore, reconsideration and withdrawal of the rejection of Claims 1-3, 5, 10, 11, 17 and 19 under 35 U.S.C. §102(b) is respectfully requested.

The secondary citation to <u>Bohler</u> relates to a solid state light source and was cited for its teaching of automatically switching color filter members.

The secondary citation to <u>Bornhorst</u> relates to a lighting fixture with a color wheel assembly and was cited for its teaching of disclosing transmittancy characteristics of the color filter members.

Finally, <u>Pettitt</u> relates to a color source selection method and was cited for its teaching of a color filter member having a white area.

It is respectfully submitted, however, that the secondary citations fail to compensate for the deficiencies in either <u>Funatsukuri</u> or <u>Hatano</u> as discussed above with respect to Applicant's independent Claim 1. Therefore, without conceding the propriety of combining the art in the manner proposed in the Office Action, such combinations still fail to teach or suggest Applicant's invention. Therefore, the rejections of Claims 4, 7, 16, 18 and 19 under 35

Accordingly, it is submitted that Applicant's invention as set forth in independent Claim 1 is patentable over the cited art. In addition, dependent Claims 2-19 set forth additional features of Applicant's invention. Independent consideration of the dependent claims is respectfully requested.

In view of the foregoing, reconsideration and allowance of this application is deemed to be in order and such action is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

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U.S.C. §103 should be reconsidered and withdrawn.

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